

*Before the
Federal Communications Commission
Washington, DC 20554*

In re Matter of)	
)	
Elimination of Main Studio Rule)	MB Docket No. 17-106
)	

Directed To: The Commission

COMMENTS OF EAGLE BLUFF ENTERPRISES

Eagle Bluff Enterprises (“Eagle Bluff”), by its attorney, hereby submits its Reply Comments with respect to the Commission’s proposal to amend the local main studio rule, 73.1125 of the Commission’s rules. With respect thereto, the following is stated.

Eagle Bluff strongly supports the proposal of the FCC and the comments filed in this proceeding proposing a significant revision of the Commission’s broadcast main studio rules. Eagle Bluff has been a broadcast licensee for a number of years. While at one time there was a legitimate public interest rationale for the Min Studio Rules, the fact of the matter is there have been tremendous sociological, regulatory, and technological changes in the past recent number of years that make the Main Studio Rule, as it currently is written, obsolete.

First of all, the biggest change that has occurred is the internet. Members of the local listening and viewing public for broadcast stations typically communicate with broadcast stations not through visiting a local main studio, but instead through comments and suggestions via email or on stations’ web sites. Eagle Bluff has had virtually no visitors to its stations’ main studios. As a result, the required staffing of a main studio does nothing more than cause resources that could be used for other endeavors to be used instead for sometimes wasteful idle employees.

Secondly, syndicated programming and automated operations are much more prevalent today than it was when the Commission's main studio rules were first adopted. Therefore, even the necessity of having a "local" nexus for the broadcast of programming has been greatly reduced.

Third, the importance of the local public inspection file has changed over the years. Not only has the volume of materials that the FCC requires be retained been greatly reduced over the years, as the FCC even points out, the FCC now is in the process of moving the file to an on-line presence. Therefore, the days when local area listeners felt a need to peruse the file at a local station is in the process of being eliminated in its entirety. Moreover, the fact of the matter is that the level of interest that typically been shown with respect to the Local Public Inspection File by members of the local public is practically non-existent. Nobody comes to view the local public inspection file! In the case of Eagle Bluff, it has been literally years since there has been a public inspection file inquiry from a member of the public.

Finally, Eagle Bluff believes that the elimination of the Main Studio rule would be useful toward allowing a consolidation of studios, thereby freeing up licensee resources to better serve the public.

Eagle Bluff wishes to emphasize that in its case, even with the elimination of the Main Studio Rules, Eagle Bluff would continue to have a strong commitment to local service. The elimination of the Main Studio Rule would in no way diminish Eagle Bluff's commitment to ascertain community problems, remain involved with the communities of license that it serves, and to serve the local public in general. Eagle Bluff believes community service is an important component of successful local broadcasting. However, it also feels that the local Main Studio rule serves as an antiquated impediment to providing strong, efficient local service.

WHEREFORE, it is respectfully requested that these Reply Comments be accepted.

Respectfully submitted,

EAGLE BLUFF ENTERPRISES

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